IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: DAISY AMARILYS LEBRON MARTINEZ DEBTOR	CASE NO. 14-09330-MCF CHAPTER 13

NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN AND CERTIFICATE OF SERVICE

TO THE HONORABLE COURT:

NOW COMES, DAISY AMARILYS LEBRON MARTINEZ, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a proposed amended Plan, dated December 19, 2014, herewith and attached to this motion.

2. This proposed amended Plan is filed to cure the insufficiently funded issue raised by the Trustee in his unfavorable report, docket #11.

WHEREFORE debtor respectfully requests the confirmation of the requested amended Plan, dated December 19, 2014.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtor, Daisy Amarilys Lebron Martinez, and to all creditors and interested parties appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 19th day of December, 2014.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
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United States Bankruptcy Court
District of Puerto Rico

IN RE: Case No. **3:14-bk-9330**

LEBRON MARTINEZ, DAISY AMARILYS Chapter **13**

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☑ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: ______ ☐ PRE ☐ POST-CONFIRMATION

☑ AMENDED PLAN DATED: **12/19/2014** Filed by: ☑ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

$ 200.00	x 12	= $	2,400.00
$ 220.00	x 48	= $	10,560.00
$	x	= $	
$	x	= $	
$	x	= $	

TOTAL: $ **12,960.00**

Additional Payments:
$______ to be paid as a LUMP SUM within ______ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in addition to the above:
$______ x ______ = $______

PROPOSED BASE: $ **12,960.00**

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: $ **2,868.00**

Signed: [signature]
Debtor

______
Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR ______ $ ______

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☑ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☐ Trustee pays secured ARREARS:

Cr. ______ Cr. ______ Cr. ______
# ______ # ______ # ______
$ ______ $ ______ $ ______

2. ☑ Trustee pays IN FULL Secured Claims:

Cr. **Coop A/C Maunabo** Cr. ______ Cr. ______
# **Claim 2-1** # ______ # ______
$ **6,198.64** $ ______ $ ______

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. ______ Cr. ______ Cr. ______
# ______ # ______ # ______
$ ______ $ ______ $ ______

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☐ Debtor otherwise maintains regular payments directly to:

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☑ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: ______
☐ Paid 100% / ☐ Other: ______

Cr. ______ Cr. ______ Cr. ______
# ______ # ______ # ______
$ ______ $ ______ $ ______

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: *(Executory contracts; payment of interest to unsecureds, etc.)*
*** "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."**
Debtor(s) to provide ADEQUATE PROTECTION PAYMENTS to Coop A/C Maunabo thru the Trustee in the sum $100.00 per month for the next eight months or until confirmation.Debtor(s) to provide auto insurance upon maturity to Coop A/C Maunabo.
Debtor(s) assumes residential lease with Daniel Matos.

Attorney for Debtor **R. Figueroa Carrasquillo Law Office** Phone: **(787) 744-7699**

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IN RE LEBRON MARTINEZ, DAISY AMARILYS
Debtor(s)

Case No. 3:14-bk-9330

AMENDED CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 1

	Cr	#	$
Executory Contracts - Assumed:	Daniel Matos		

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Label Matrix for local noticing
0104-3
Case 14-09330-MCF13
District of Puerto Rico
Old San Juan
Fri Dec 19 11:32:40 AST 2014

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PO BOX 366818
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Maunabo, PR 00707-0127

Daniel Matos
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Juncos, PR 00777-9725

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End of Label Matrix
Mailable recipients 11
Bypassed recipients 0
Total 11